

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBIT ATTACHED HERETO	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

JOINT MOTION TO DISMISS WITH PREJUDICE AND TRANSFER TO MDL 2326

Plaintiffs, whose cases are listed on the attached Exhibit A, and Defendants Johnson & Johnson, Inc., Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move the court to dismiss with prejudice this action and all claims against the Ethicon Defendants which were, or could have been asserted, pursuant to F. R. Civ. P. 41(a)(1)(A)(ii). Each party shall bear her or its own costs. The dismissals of the cases listed on Exhibit A relate only to the Ethicon Defendants. Plaintiffs continue to pursue claims against Boston Scientific Corp., and respectfully request the Court transfer their cases to MDL 2326.

Respectfully submitted,

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EXHIBIT A

Civil Action Number	Case Name
2:15-cv-11929	Cardoza v. Ethicon
2:14-cv-03587	Fiorentino v. Ethicon
2:14-cv-04553	Taylor v. Ethicon

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

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